

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

DAVID STEBBINS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 10-3305-CV-S-RED
)	
RELIABLE HEAT & AIR, LLC, et al.,)	
And)	
)	
RANDALL RICHARDSON, et al.)	
)	
Defendants.)	

DEFENDANTS' FIRST INTERROGATORIES TO PLAINTIFF

COMES NOW Defendants, Reliable Heat & Air, LLC and Randall Richardson, by and through counsel, and submits the following First Set of Interrogatories Directed to Plaintiff, David Stebbins, to-wit:

Plaintiff is requested to answer the following interrogatories fully and completely, in writing, under oath, and in the event that Plaintiff denies any said request, to state specifically each and every reason for denying same as required by Rule 33. (b) (3) and (4).

1. State your name, current address, social security number, and date of birth.

Answer:

2. State the address of each residence you have resided at for the past five (5) years, and the length of time occupying each residence.

Answer:

3. State the name, address and phone number of each employer you have had for the past five (5) years and provide the following with reference to each employment:

- a. Date of beginning and ending of each employment
- b. Brief of each job description
- c. Reason for termination of each employment.

Answer:

4. State in detail each and every act you claim Defendants did to discriminate against you, as claimed in your complaint, including the date of such act.

Answer:

5. Identify all persons who were eyewitnesses to all or any part of the occurrences mentioned in your answer to the previous interrogatory or all persons who have any personal knowledge of occurrence or occurrences.

Answer:

6. List each item of damage which you claim, state its dollar value, how it is calculated, and the date it was incurred or is expected to be

incurred, and identify all documents referring or relating to each such item or calculation.

Answer:

7. Identify all persons whom you expect to call as expert witnesses at trial, and for each such expert state the general nature of the subject matter on which the expert is expected to testify.

Answer:

8. Identify each physician or other health professional who has examined or treated you since the date of the occurrences, and for each such person state the date and purpose of each such examination or treatment.

Answer:

9. State your gross income for the years of 2006, 2007, 2008, 2009 and 2010.

Answer:

10. Identify all documents upon which you rely to establish proof of your claim against the Defendants and your damages claimed as a result of the alleged act or acts of the Defendants.

Answer:

11. Describe in detail the "hostile work environment" as alleged in your complaint.

Answer:

12. Describe in detail your alleged disability of “Asperger Syndrome”, including the symptoms and results of such disability.

Answer:

13. Describe the “harassment” executed by Randall Richardson as alleged in your complaint.

Answer:

14. Describe in detail what “reasonable accommodation” would have permitted you to perform the job, as alleged in your complaint.

Answer:

15. Describe in detail how you were “wrongfully terminated” from your job as alleged in your complaint.

Answer:

16. Describe what alternate or accommodating job positions or other job related the Defendants offered modifications to you.

Answer:

I, David Stebbins, have read the foregoing answers to interrogatories and they are true to the best of my knowledge, information and belief.

David Stebbins

STATE OF ARKANSAS)
) SS
COUNTY OF BOONE)

Sworn to before me this _____ day of January 2011.

Notary Public
My Commission Expires:


Gary W. Allman Bar #19921
P.O. Box 5049
Branson, Mo 65615
Phone: (417) 332-2800
Fax: (417) 332-1008
garywallman@gmail.com
Attorney for: Defendants

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CERTIFICATE OF SERVICE

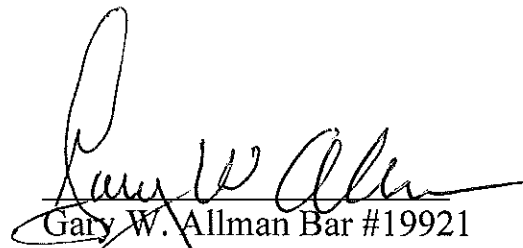
The undersigned hereby certifies that a true and correct copy of:

Defendants' First Interrogatories to Plaintiff.

Was served upon:

David Stebbins
1407 N Spring Rd. Apt #5
Harrison, AR 72601
Email: stebbinsd@yahoo.com

() by delivering a copy to him;
() by leaving a copy at his office with his clerk;
() by leaving a copy at his office with an attorney associated with him;
(x) by mailing a copy to him, as prescribed by law;
(x) by transmitting a copy to them by email transmission at
stebbinsd@yahoo.com on the ~~1st~~ ^{5th} day of January 2011..

A handwritten signature in black ink, appearing to read "Gary W. Allman", is written over a horizontal line.

Gary W. Allman Bar #19921

P.O. Box 5049

Branson, Mo 65615

Phone: (417) 332-2800

Fax: (417) 332-1008

garywallman@gmail.com

Attorney for: Defendants